

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

**IN RE:**

**Terrance A. Ryan and  
Margaret S. Ryan,**

**Case No. 18-11217  
(Chapter 13)**

**Debtors.**

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**ANDREA E. CELLI,  
CHAPTER 13 TRUSTEE.**

**Adversary Proceeding  
No. 18-90026**

**Plaintiff,**

**-against-**

**THE CITY OF TROY, NEW YORK**

**Defendant.**

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**STIPULATION AND ORDER EXTENDING TIME TO ANSWER ADVERSARY  
PROCEEDING PURSUANT TO 11 U.S.C. §548**

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned  
counsel as follows:

1. The City of Troy took title to real property located at 21 120<sup>th</sup> Street, Troy, New York (the "Property") within two years of the filing of the instant bankruptcy case.

2. The Chapter 13 Trustee has asserted her interest in pursuing a cause of action to reverse the transfer of the subject property pursuant to 11 U.S.C. §548 and has communicated her interest in said cause of action on behalf of the bankruptcy estate to Debtor's counsel, Marc S. Ehrlich, Esq. and Corporation Counsel for the City of Troy, James A. Caruso, Esq.

3. The parties acknowledge the Trustee's right to assert a cause of action and file an adversary complaint pursuant to 11 U.S.C. §548 and have discussed the propriety of permitting the parties time to resolve the Trustee's claim by settlement as Debtors are currently residing in the Property.

6. The parties hereby agree to extend the time for Edward R. Marinstein, Esq., counsel to the City of Troy, to file an Answer in the above adversary proceeding beyond the existing statute of limitations through and including January 25, 2019.

7. This Stipulation may be executed in one or more counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same instrument. Moreover, signatures of the Stipulation sent by facsimile or electronic mail transmission shall be deemed the equivalent of original signatures.

8. This Stipulation shall be effective between the parties whether or not it is so ordered by the Bankruptcy Court.

Dated: October 15, 2018

ANDREA E. CELLI, ESQ.  
Chapter 13 Standing Trustee

By:  \_\_\_\_\_

Dated: October 12, 2018

MARC S. EHRLICH, ESQ.  
Counsel to the Debtor

By: 

Dated: October 12, 2018

JAMES A. CARUSO, ESQ.  
Corporation Counsel for the City of Troy

By: 

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